IN CLESSED

DISTER

UNITED STATES DISTRICT COURT 26 DISTRICT OF MASSACHUSETTS

LIA DEVITRI, EVA GRASJE, SYANE KALOH, JOHN LONDA, MELDY LUMANGKUN, MARTIN LUMINGKEWAS, MEIVE LUMINGKEWAS, TERRY ROMBOT, AGUS SETIAWAN, FREDDY SOMBAH, POPPY SOMBAH, and all other individuals similarly situated,

Petitioner-Plaintiffs,

v.

CHRIS M. CRONEN, Boston Field Office Director for Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement; TIMOTHY STEVENS, Manchester Sub-Office Director for Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement; and ELAINE C. DUKE, Acting Secretary of the U.S. Department of Homeland Security,

Respondent-Defendants.

TERRY HELMUTH ROMBOT,

Petitioner,

v.

ANTONE MONIZ, Superintendent, Plymouth County Correctional Facility,

Respondent.

Civil Action No.

Civil Action No.

17-cv-11577-PBS

MOTION OF JOHN A. HAWKINSON, PRO SE, TO (1) INTERVENE FOR THE LIMITED PURPOSE OF MOVING FOR AN ORDER TO PERMIT REMOTE ACCESS TO ELECTRONIC COURT FILINGS PURSUANT TO FRCP 5.2(c); AND (2) TO REQUEST ECF FILING PRIVILEGES

John A. Hawkinson, a freelance news reporter writing for Cambridge Day, respectfully moves to intervene in this action for the limited purpose of filing a motion seeking an order

allowing the public to remotely access non-sealed electronic court filings on PACER in these cases pursuant to Fed. R. Civ. P. 5.2(c). As grounds for his motion, Hawkinson relies on his memorandum in support, filed herewith. See also *In re Boston Herald, Inc.*, 321 F.3d 174, 177 (1st Cir. 2003) (noting intervention of media in criminal case for purpose of pursuing access request); *In re Globe Newspaper Co.*, 729 F.2d 47, 50 n.2 (1st Cir. 1984) ("Some courts have held that media representatives may challenge closure orders by appeal if they first intervene in the underlying action."); *Lunn v. Smith*, No. 17-cv-10938, D.E. 42,43 (D. Mass, Aug. 21, 2017) (granting the Hawkinson's motions to intervene and to permit remote PACER access in an immigration case).

Hawkinson also moves this Court for permission to file electronically with his existing pro se ECF account for the purpose of efficiently filing and serving such documents as may be necessary within the limited scope of his intervention. As justification, Hawkinson avers he is familiar with the CM/ECF and PACER systems, the Federal Rules of Civil Procedure, the Local Rules of the District of Massachusetts, and the CM/ECF Administrative Procedures of the District of Massachusetts. Hawkinson already has pro se ECF privileges in another case in this District (Lunn).

(pending) INTERVENOR,

JOHN A. HAWIZINSON, pro se

John A. Hawkinson

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Dated: September 28, 2017

CERTIFICATE OF SERVICE

I, John A. Hawkinson, do hereby certify that a true copy of the above document was served upon the attorneys of record for each party to these actions by electronic mail on September 28, 2017, having previously received written consent for electronic service pursuant to FRCP 5(b)(2)(E), to:

Ronaldo Rauseo-Ricupero Nixon Peabody, LLP rrauseoricupero@nixonpeabody.com

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and by first class mail to:

Vinita B. Andrapalliyal United States Department of Justice P.O. Box 868, Benjamin Franklin Station Washington, DC 20530

> John A. Hawkinson September 28, 2017